

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
Section 1: Pre-Audit General Review- Policies/Procedures						
1.1	FI has a signed contract with the CMHSP's.	SD Policy/Practice Guideline, IV.B; FI Technical Requirement, II.	CMHSP - signed contract	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.2	FI submitted an acceptable plan of correction from previous audits to CMHSP's.	Monitoring & Evaluation Policy/Procedure	CMHSP - accepted CAPs from previous audits	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.3	FI has submitted proof of financial solvency to CMHSP's.	Contract, 4.2	CMHSP - most current financial audit	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.4	FI has furnished proof of authority to conduct business in the State of Michigan.	Contract, 4.1	FI - article of incorporation, LLC, etc.	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.5	Does FI have any sanctions or non-compliance notices with any CMHSP's?	Contract, 39	CMHSP - official documentation of non-compliance or sanctions	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.6	Monthly Expense Reports with valid claims are submitted timely to the CMHSP and the consumer. (no later than 30 days after the end of each calendar month)	Contract, SoW 5.2	CMHSP - validation of timely claims submission FI: Evidence of monthly reports being sent to SD participant	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.7	FI processes payroll and pays other invoices in a timely and accurate manner as measured by receipt of check late or checks being reissued.	Contract (SoW 2.3.5)	FI - Payroll journal/report	CMHSP Reviewers to confirm and respond. No action needed by FI.		
1.8	Contract reconciliation was completed for previous FY per contract requirements (If applicable)	Contract (SoW 2.2.5.1)	Monthly reconciliation acceptable if required by FI, Annual reconciliation	CMHSP Reviewers to confirm and respond. No action needed by FI.		

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1.9	FI assures accommodation of physical and communication limitations for consumers.	Contract/Agreement 13.3	FI - Policies/ Procedure; Documentation about accessibility			
1.10	FI assures equal access for people with diverse cultural backgrounds and/or limited English Proficiency. FI can demonstrate a commitment to linguistic and cultural competence including applying understanding of the relationships of language and culture to the delivery of services.	Contract Section 38	Policies, Procedures			
1.11	FI notifies CMHSP's when FI staff becomes aware of an issue related to a program consumers' responsibilities (e.g. untimely timesheet filing, unresponsive to requests for required forms, etc.) and/or any incidences of financial fraud/abuse or a program consumer's inability to perform required tasks.	Contract Section 23, MDHHS Self Determination Technical Advisory IV.B	FI - Policy/Procedure			
1.12	FI has developed comprehensive Policies and Procedures that document all FI tasks, including all applicable Federal and State forms and documents internal controls for each FI task.	MDHHS Self Determination Technical Advisory IV.A	FI - Policy/Procedure			
1.13	Consumer Record Retention policy (keep documents for at least 7 years) including maintenance and disposal of current and archived program consumer, staff, and FI files onsite in a secure and confidential manner as required by Federal and state Rules and Regulations. (e.g. program records are kept in a secure dry safe place with restricted access, using a password protected computer system)	Contract 11.4	FI - Policy/Procedure			

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1.14	FI provider notifies CMHSP of any event or information that raises questions regarding the Health and Safety of any consumer receiving services under the CMHSP and provider agreement	Contract, 22.1	FI - Policy/Procedure			
1.15	FI provider complies with all recipient rights rules and policies and implements remedial action for substantiated allegations of rights violation	Contract, 22	FI - Policy/Procedure			
1.16	FI complies with grievance procedures for receiving, processing, and resolving promptly and any and all complaints, disputes, and grievances	Contract, 22	FI - Policy/Procedure			
1.17	FI provider shall procure, pay the premium on, keep and maintain liability insurance covering act, omissions, and negligence of the provider and in appropriate amounts;	Contract, Section 16	Insurance policy/certificate of insurance			
	1. Workers compensation, when and as required by law					
	2. Employers liability, when and as required by law					
	3. PROFESSIONAL LIABILITY COVERAGE (ERRORS & Omissions of not less than \$1,000,000 per occurrence					
	4. General liability insurance (occurrence basis only) of not less than \$1,000,000 per occurrence and/or otherwise as allowed by contract					
5. Employee dishonesty bond, limits of \$500,000 per occurrence (if applicable - SCCMHA)						

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
1.18	FI has an effective procedure in place to monitor compliance with staff training requirements as evidenced by review of staff records.	Contract 2.4.16	FI - Policy/Procedure			
1.19	FI will notify the employer, the consumer's primary clinician, and CMHSP's Self Determination Coordinator when non-compliance with training requirements are identified.	Contract 2.4.16	FI - Policy/Procedure			
1.20	In coordination with CMHSP, FI has a standard orientation protocol for consumers (Please attach a copy of orientation protocol and related materials).	Contract 2.2.7	FI - Policy/Procedure	This will include role of FI/consumer and general overview of processes.		
1.21	In coordination with CMHSP, FI provides consumers with resources that guide them through the process of selecting qualified staff.	Contract 2.2.12	FI - Policy/Procedure			
1.22	In coordination with CMHSP, FI provides a sample job interview format for consumers.	Contract 2.2.9	FI - Policy/Procedure			
1.23	In coordination with CMHSP, FI notifies consumers of training requirements at enrollment and when CMHSP's provide written notice of training requirement updates.	Contract 2.4.16	FI - Policy/Procedure			
1.24	In coordination with CMHSP, FI assists the consumers in understanding reporting, invoice processing, and documentation responsibilities.	Contract 2.2.11	FI - Policy/Procedure			

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
1.25	FI evaluates all orientation materials and its standard orientation protocol regularly to ensure accuracy and compliance with standards.	Contract 2.2.12	FI - Policy/Procedure			
1.26	FI distributes, collects, and processes program consumer enrollment and staff employment packets in a timely and accurate manner.	Contract 2.2.13	FI - Policy/Procedure			
1.27	FI assists consumers with understanding legal developments that affect their roles and responsibilities as employer.	Contract 2.2.14	FI - Policy/Procedure			
1.28	FI assists each consumer with the use and understanding of his/her individual budget as requested or needed.	Contract 2.2.15	FI - Policy/Procedure			
1.29	Financial, Service, and Consumer data is maintained by FI.	Contract 2.4, MDHHS Self Determination Technical Advisory IV.A	FI - Policy/Procedure			
1.30	FI Completed all necessary documentation required for employees/employers required by federal and state regulations (i.e. IRS forms, federal and state tax forms, homeland security forms, etc.)	Contract	Policies, Procedures, File documentation/employee completed packets			
60		0	Total Score		0	0

Section 1: Pre-Audit General Review- Policies/Procedures Findings and Corrective Action

Strengths:

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
Findings:						
Recommendations:						
Section 2: Staff Training Review (Score auto fills from SD Employee Chart Summary tab)						
2.1	Infection Control/Blood Borne Pathogens – Due within 30 days of hire and annually	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	
2.2	First Aid– Due within 30 days of hire and current certification thereafter as required by training entity (i.e. American Red Cross)	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to ensure that First Aid training was completed timely and renewed timely and current. Training entity requirements vary across CMHSPs	0	
2.3	Recipients Rights Training – Due within 30 days of hire and annually	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	

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2.4	Environmental Safety– Due within one year of hire	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	This training is required only initially. Ensure that training was completed timely if hired in last 2 years. If hired more than 2 years ago- verify training has been completed.	0	
2.5	Limited English Proficiency Training – Due within 90 days of hire and annually	MSHN Training Grid-Contract Attachment, Contract-	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	
2.6	HIPAA Privacy & Security Training- Due within 30 days of hire and annually	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	
2.7	Person Centered Planning (Consumer Plan) – Due within 30 days of hire and annually	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
2.8	Non-Physical Intervention and De-escalation – Due within 90 hire.	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	This training is required only initially. Ensure that training was completed timely if hired in last 2 years. If hired more than 2 years ago- verify training has been completed. *CMHSPs vary in the training format.	0	
2.9	Cultural Competency – Due within one year of hire and annually	MSHN Training Grid-Contract Attachment, Contract- Section 38	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	
2.10	Corporate & Regulatory Compliance – Due within 90 days of hire and annually	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	Reviewer to review last 2 years of training as applicable. If hired more than 2 years ago, ensure that the last 2 completed trainings were completed and within required timeframes.	0	
2.11	Trauma Informed Care- within first 90 days of hire	MSHN Training Grid-Contract Attachment	FI - Staff Training Records, Evidence of training requirements (orientation packet)	This training is required only initially. Ensure that training was completed timely if hired in last 2 years. If hired more than 2 years ago- verify	0	

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
				training has been completed.		
22		0	0		0	0
Section 2 Staff Training: Findings and Corrective Action						
Strengths:						
Findings:						
Recommendations:						
Section 3: SD Staff File Review (Auto fill from SD Employee Chart Summary Tab)						
3.1	FI maintains a copy of the employment agreement between Consumer and Employee.	Contract (SOW) 2.4.9	Staff Files		0	
3.2	Provider Agreement on file (defines roles of CMH, Employer and Employee)	Contract (SOW) 2.4.12	Staff Files		0	
3.3	Documentation that the employee is 18 years or older (e.g. state issued ID)	Medicaid Manual	Staff Files		0	

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
3.4	Criminal background check is conducted prior to hire.	Contract (SOW)	Staff Files	Many FI's mail a packet for completion to an employee. The employee mails the packet back and upon verifying the FI has all paperwork they then run background check. Make sure check was prior to first day of work.	0	
3.5	Criminal background check is completed at minimum, every other year.	Contract (SOW) 2.4.10, 2.4.17; MSHN Policy	Staff Files	Verify dates of last 2 background checks to ensure did not exceed 1 year.	0	
3.6	If conviction on criminal background check, a criminal background waiver is on file with FI.	MSHN Disqualified Provider Policy	Staff Files		0	
3.7	Copy of automobile insurance if the employee transports consumers. (Documentation required at initial hiring)	Contract (SoW 2.4.20)	Staff Files	Reviewer to ensure that upon hire a copy of the insurance was collected.	0	
3.8	Copy of valid driver's license if the employee transports consumer? To verify current driving status.	Contract (SoW 2.4.21)	Staff Files		0	
3.90	At the time of hire, employee release to authorize annual driver's license checks signed by the employee	Contract (SOW)	Staff Files		0	
3.10	Copy of a signed job description, pay rate information, and employment hiring (termination) information.	MDHHS Self Determination Technical Advisory	Staff Files	description and pay rate information have been found in employee agreements.	0	
3.11	Employee file contains Federal W4, Michigan W4, I-9 d supporting documentation.	Contract (SOW) 2.4.8	Staff Files		0	

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
3.12	Unemployment claims are on file, if applicable.	Contract (SOW) 2.4.20	Staff Files		0	
3.13	Workers Comp claims are on file, if applicable.	Contract (SOW) 2.4.14	Staff Files		0	
3.14	Timesheets and supporting documentation is received.	Contract (SOW) 2.3.4	Staff Files	Timesheet hours vs. work evidence of work completed by employee	0	
3.15	Timesheet is mathematically correct.	Contract (SOW) 2.3.4	Staff Files	Sample timesheets to ensure correct	0	
3.16	Timesheet has proper signatures (employee as well as consumer/guardian).	Contract (SOW) 2.3.4	Staff Files, sample timesheets		0	
3.17	Pay rate is verified.	Contract (SOW) 2.3.4	Staff Files, sample timesheets and pay rate documents	Sample pay check summary to verify pay rate amount reflects amount in employee agreement.	0	
3.18	Payroll amount paid is verified.	Contract (SOW) 2.3.4	Staff Files- payment documentation and timesheets	Sample pay check summary to verify that amount pay rate amount is what was paid (hourly) to employee	0	
3.19	FI has proof of payroll tax information and matches the requirements set forth by state and federal government.	Contract (SOW) 2.4	Staff Files		0	
		0	0	0	#DIV/0!	
Section 3: SD Staff File Findings and Corrective Action						
Strengths:						

#	STANDARD	Basis/Source	Evidence of Compliance could include:	Reviewer Guidelines	Compliance Score (0, 1, 2, NA)	Evidence Found:
Findings:						
Recommendations:						
Section 4: SD Participant File Review (Score auto fills from SD Participant Chart Summary)						
4.1	Each consumer has an annual self-determination budget.	MDHHS Self Determination Policy and Practice Guideline	Budget		0	
4.2	Consumers have a revised self-determination budget, if applicable.	MDHHS Self Determination Policy and Practice Guideline	Budget		0	
4.3	FI ensures a Worker’s Compensation insurance policy is in effect for each participant .	Contract 6.4	Insurance policy		0	
4.4	FI has a separate FEIN specifically to file the IRS forms 2678 and selected Federal tax forms on program consumer’s behalf.	Contract 2.4.6	FI - Policy/Procedure and copy of FEIN		0	
4.5	If over/under 10% of budget, highlighted	MDHHS Fiscal Intermediary Technical Requirement IV.A	Monthly budgets		0	
4.6	Individual Budgets – compare authorizations versus expenditures	MDHHS SD/ Fiscal Intermediary Technical Requirement IV.A	Monthly Budgets		0	
32		0	0		0	0
Section 4: SD Participant File Findings and Corrective Action						

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Strengths:						
Findings:						
Recommendations:						
Section 5: Quality Improvement, Performance Indicators and Objectives, Consumer Assessment and Outcomes Studies						
5.1	Are there repeat findings from previous audit(s)?	Contract	Previous Year Reviews Final reports			
5.2	FI obtains and evaluates consumer feedback, experience and satisfaction with the receipt of FI services, has alternative methods for collecting this information (i.e. more than mail surveys), and uses feedback to make improvements to systems, policies, and procedures.	MDHHS Fiscal Intermediary Technical Requirement	Site review, evidence of feedback mechanism, interview with FI explaining processes.			
4		0	Total Score		0	0
Section 5: QI, Performance Indicators and Objectives, Consumer Assessment and Outcome Studies Summary of Findings and Corrective Action						
Strengths:						
Findings:						
Recommendations:						

